

STATE OF COLORADO

Roy Romer, Governor
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Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

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Colorado Department
of Public Health
and Environment

April 2, 1998

John Rampe, D&D Program Leader
DOE-RFFO
P O Box 928
Golden, CO 80402-0928

Comments on the March 16, 1998 DPP

Dear John

CDPHE has reviewed the March 16, 1998 draft of the Decommissioning Program Plan and is providing comments as noted below. We had hoped to transmit these comments via a walk through of the document between Edd Kray and Fred Gerdeman, however at your request we have attempted to formalize these comments. Upon the resolution of the comments by incorporation into the document or discussion between ourselves, the DPP should be suitable for release for public comment. We have not consulted with EPA on our comments, however, will note that the DPP is a sitewide document under RFCA, requiring approval by both EPA and CDPHE.

Comments

section/paragraph

- | | |
|-----------|--|
| 1 / 2 | reword to note that decommissioning may occur concurrently with deactivation in some buildings |
| 1 1 / 8 | (Bullet #4) add to end of third sentence "while remaining cognizant of issues, resolutions and agreements identified in prior contractor/regulator interactions" |
| 1 1 / 8 | (Bullet #4) change in fourth sentence "to approve decommissioning decisions documents" to "to approve decommissioning decisions and documents" |
| 1 1 / 10 | last sentence is unnecessary |
| 1 1 2 / 2 | in first sentence, replace "is a list of specific" with "are examples of" |

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- 1 1 3 / 1 Change the first sentence to read "The DPP is the RFCA document that describes the steps "
- 1 1 3 / 1 change the seventh sentence to read " to be free of contamination may, **after consultation**, go directly to reuse "
- 1 1 4 header is not descriptive for the section
- 1 1 4 / 2 change first sentence to read " to require a RFCA decision **or decision** document "
- 1 1 4 / 2 this part would be better as a stand alone section, or possibly relocated to Section 3 2
- 1 1 4 RFCA D3M, footnote 3, add " and includes backlog, legacy and existing waste "
- 1 1 4 RFCA D3M, E, fourth bullet, add after scope "or in the event assumptions used are no longer accurate "
- Fig 1 1-1 box labeled "record agreement or approval" should extend across the vertical line from the Y's to "no RFCA decision document required" Regardless of the path, documentation that a RFCA decision document is not required is necessary
- 1 1 5 / 1 add to last sentence "developed through the RFCA process, including public review and comment "
- 2 2 / 1 replace "has sorted" with "will sort"
- 2 2 / 2 change to read "Radioactive materials were not stored or used in the building **nor is the building contaminated due to releases from external or historical site events.**"
- 2 2 / 4 can we describe Type 2 as "Moderately contaminated buildings"? Suggest the following language "Type 2 buildings contain some degree of radiological or hazardous contamination as a result of historical plant or building activities The extent of the contamination is such that routine methods of decontamination should suffice and only a moderate potential exists for environmental releases during decommissioning "

- 2 2 / 5 suggest the following language "Type 3 buildings contain extensive radiological or hazardous contamination, usually as a result of plutonium processing operations or accidents Contamination exists in gloveboxes, HVAC systems and building structure Unique and risky decommissioning methods will be used for building disposition "
Replace "will have significant contamination" with "to be classified as Type 3 "
- 2 3 / 2 after Defense Nuclear Facilities Safety Board, insert ", if appropriate"
- 2 3 1 / 1 first line, delete "DOE declares that"
- Fig 3 4-1 change "scoping meeting" to "scoping"
Delete "prepare" from "prepare Reconnaissance "
In three places, change "send notification letter" to "notification letter/regulator concurrence"
- 3 4 2 1 / 1 revise second sentence to read "The Site will include hazard information in its RLC report "
Revise the third sentence to read " The hazard assessment will help Site personnel and the LRA determine the possible risks to workers, the public and the environment during decommissioning and assess controls "
- 3 4 4 / 1 change the second sentence to read " the facility walkdown, ~~and~~ historical information, **and additional surveys** "
- 3 4 4 / 1 add to the beginning of the sixth sentence, "**For Type 1 buildings**, if the LRA "
- 3 4 4 / 2 delete second sentence
- 3 4 6 / 3 add at the beginning, "A readiness assessment will be conducted prior to initiating decommissioning of a Type 2 or 3 building "
- 3 4 7 1 / 1 change third sentence to read "Support buildings associated with a major project may be included in its DOP if they would be managed in the same project "
- 3 4 7 1 Table of Contents, retitle "Project Approach" as "Project Activities" and retitle "Health and Safety" as "Project Controls" Relocate appropriate items from "Project Approach" to "Project Controls"

John Rampe, D&D Program Leader

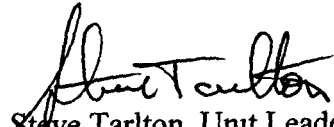
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3 4 8 1 & 3 4 10 2 Replace with " A final survey consistent with MARSSIM is performed prior to demolition or reuse to verify compliance with release criteria Independent verification will take place as determined by DOE and LRA consultation "

Should you have any questions, please contact me at 692-3423

Sincerely,



Steve Tarlton, Unit Leader
Rocky Flats Oversight Unit

CC Steve Gunderson, CDPHE
 Tim Rehder, EPA
 Steve Slaten, DOE
 Dave Shelton, KH
 Fred Gerdeman, DOE